

Robert A. Julian (SBN 99469)  
Cecily A. Dumas (SBN 111449)  
BAKER & HOSTETLER LLP  
1160 Battery Street, Suite 100  
San Francisco, CA 94111  
Telephone: 628.208.6434  
Facsimile: 310.820.8859  
Email: rjulian@bakerlaw.com  
Email: cdumas@bakerlaw.com

Eric E. Sagerman (SBN 155496)  
Lauren T. Attard (SBN 320898)  
BAKER & HOSTETLER LLP  
11601 Wilshire Boulevard, Suite 1400  
Los Angeles, CA 90025  
Telephone: 310.820.8800  
Facsimile: 310.820.8859  
Email: esagerman@bakerlaw.com  
Email: lattard@bakerlaw.com

*Counsel for Official Committee of Tort Claimants*

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

**In re:**

**PG&E CORPORATION**

**-and-**

**PACIFIC GAS AND ELECTRIC  
COMPANY,**

**Debtors.**

- ☐ Affects PG&E Corporation
- ☐ Affects Pacific Gas and Electric Company
- ☒ Affects both Debtors

*\*All papers shall be filed in the Lead Case,  
No. 19-30088 (DM)*

Bankruptcy Case  
No. 19-30088 (DM)

Chapter 11  
(Lead Case)  
(Jointly Administered)

**NOTICE OF MOTION OF THE  
OFFICIAL COMMITTEE OF TORT  
CLAIMANTS FOR ENTRY OF A  
PROTECTIVE ORDER**

Date: June 26, 2019  
Time: 9:30 a.m. (Pacific Time)  
Place: United States Bankruptcy Court  
Courtroom 17, 16th Floor  
San Francisco, CA 94102

**Objection Deadline:** June 19, 2019, 4:00  
p.m. (Pacific Time)

1       **PLEASE TAKE NOTICE** that on January 29, 2019 (the “**Petition Date**”), PG&E  
2       Corporation and Pacific Gas and Electric Company, as debtors and debtors in possession  
3       (the “**Debtors**”) in the above-captioned chapter 11 cases (the “**Chapter 11 Cases**”), each filed a  
4       voluntary petition for relief under chapter 11 of title 11 of the United States Code (the “**Bankruptcy**  
5       **Code**”) with the United States Bankruptcy Court for the Northern District of California (San  
6       Francisco Division) (the “**Bankruptcy Court**”).

7       **PLEASE TAKE FURTHER NOTICE** that the Bankruptcy Court will hold a hearing on  
8       June 26, 2019 at 9:30 a.m. (Pacific Time) (the “**Omnibus Hearing**”) in the courtroom of the  
9       Honorable Dennis Montali, United States Bankruptcy Judge, Courtroom 17, 16th Floor, 450  
10      Golden Gate Avenue, San Francisco, California 94102.

11      **PLEASE TAKE FURTHER NOTICE** that, in addition to any other matters scheduled for  
12      the Omnibus Hearing, the Bankruptcy Court is scheduled to hear the *Motion of the Official*  
13      *Committee of Tort Claimants for Entry of a Protective Order*, which was filed on June 5, 2019 (the  
14      “**Motion**”).

15      **PLEASE TAKE FURTHER NOTICE** that any oppositions or responses to the Motion  
16      must be in writing, filed with the Bankruptcy Court, and served on the counsel for the Official  
17      Committee of Tort Claimants at the above-referenced addresses so as to be received by no later  
18      than **4:00 p.m. (Pacific Time) on June 19, 2019**. Any oppositions or responses must be filed and  
19      served on all “Standard Parties” as defined in, and in accordance with, the *Second Amended Order*  
20      *Implementing Certain Notice and Case Management Procedures* entered on May 14, 2019 (ECF  
21      No. 1996) (the “**Case Management Order**”). **Any relief requested in the Motion may be**  
22      **granted without a hearing if no opposition is timely filed and served in accordance with the**  
23      **Case Management Order**. In deciding the Motion, the Court may consider any other document  
24      filed in these Chapter 11 Cases and related Adversary Proceedings.

25      **PLEASE TAKE FURTHER NOTICE** that copies of the Motion and its supporting papers  
26      can be viewed and/or obtained: (i) by accessing the Court’s website at  
27      <http://www.canb.uscourts.gov>, (ii) by contacting the Office of the Clerk of the Court at 450 Golden  
28      Gate Avenue, San Francisco, CA 94102, or (iii) from the Debtors’ notice and claims agent, Prime  
29      Clerk LLC, at <http://restructuring.primeclerk.com/pge> or by calling (844) 339-4217 (toll free) for  
30      U.S.-based parties; or +1 (929) 333-8977 for International parties or by e-mail at:  
31      pginfo@primeclerk.com. Note that a PACER password is needed to access documents on the  
32      Bankruptcy Court’s website.

33      Dated: June 5, 2019

BAKER & HOSTETLER LLP

By: /s/ Robert Julian

*Counsel for The Official Committee of Tort  
Claimants*